



Solutia Inc.
Indian Orchard Plant
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September 10, 2019

U.S. Environmental Protection Agency
Water Enforcement, OES4-SMR
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Submitted via NetDMR

Re: NPDES Permit #MA 000 1147

Dear Sir/Madam:

Please find enclosed the annual wet weather August NPDES Discharge Monitoring Report Forms for Solutia Inc., Indian Orchard, for 2019. This report includes the supporting analytical laboratory documents for wet weather monitoring. Also enclosed is the current Delegation of Authority for the signing of water program documents.

Per attached August 21, 2017, e-mail from George Papadopoulos, US EPA, it is acceptable for our e-coli results in MPN (Most Probable Number) to be reported in the value as a CFU (Colony Forming Units).

* Per NPDES Permit No. MA0001147, Part I.A.1 (Dry Weather Monitoring of Outfall 009), Footnote 1: Monitoring is only required March–November, inclusive. This is based on the unsafe conditions associated with access to the sampling location via steep slopes, sampling is not required during the winter months.

* Per NPDES Permit No. MA0001147, Part I.A.3 (Dry Weather Monitoring of Outfall 017), Footnote 7: Monitoring frequency shall be 1/Month for December–February, inclusive. During the months of March–November, monitoring frequency shall be 3/Month.

If you have any questions regarding this report, please contact Andrew Orciari at 413-730-3291.

Sincerely,

Shawn Pace
Site Manager

cc: Enclosure to: Massachusetts Department of Environmental Protection – *Submitted via NetDMR*
Bureau of Waste Prevention
Western Regional Office
436 Dwight Street
Springfield, MA 01103

Massachusetts Department of Environmental Protection – *Submitted via NetDMR*
Division of Watershed Management
Surface Water Discharge Permit Program
8 New Bond Street
Worcester, MA 01606

Orciari, Andrew P

From: Papadopoulos, George <papadopoulos.george@epa.gov>
Sent: Monday, August 21, 2017 9:55 AM
To: Orciari, Andrew P; Nagle, John
Subject: RE: [I] eColi by 1603

Hi Andrew,

Although MPN and cfu/100 mL are not equivalent, my understanding is that we allow reporting the value of E. coli in MPN if the limit is expressed as a cfu number.

George Papadopoulos – USEPA

(617) 918-1579

From: Orciari, Andrew P [mailto:andreworciari@eastman.com]
Sent: Monday, August 21, 2017 9:32 AM
To: Nagle, John <Nagle.John@epa.gov>
Cc: Papadopoulos, George <papadopoulos.george@epa.gov>
Subject: RE: [I] eColi by 1603

Good Morning John,
Did you have a chance to review my question below on our eColi reporting requirements?
Please let me know if you need any further information.
Thank you for your help.
Andrew Orciari

From: Orciari, Andrew P
Sent: Monday, July 31, 2017 2:03 PM
To: 'nagle.john@epa.gov' <nagle.john@epa.gov>
Subject: FW: [I] eColi by 1603

Good Afternoon John,
My name is Andrew Orciari and I am writing about NPDES Permit# MA0001147 for Solutia Inc.
The contractor we use for our NPDES permit testing (Test America) informed me that the lab we use to test our eColi samples is shutting down. The contractor cannot find any labs in Western MA that tests for eColi using method 1603. They did find a lab in Manchester CT that tests for eColi but they use method 9223B. 9223B reports in units of MPN – most probable number and 1603 reports in units of CFU – colony forming units. According to our permit we need to report in units of CFU. Would you let me know if units of MPN and CFU are equivalent?
Thank you for your help.

Andrew Orciari
Environmental Representative
Eastman Chemical Company
730 Worcester Street
Springfield, MA 01151
Office: (413) 730-3291
Cell: (413) 374-1152

Email: Andreworciari@eastman.com

From: Hartmann, Steve [<mailto:Steve.Hartmann@testamericainc.com>]

Sent: Monday, July 31, 2017 12:59 PM

To: Orciari, Andrew P <andreworciari@eastman.com>

Subject: [I] eColi by 1603

Andrew,

I was using Eurofins Spectrum in Agawam to subcontract your eColi samples. They just informed us that they are shutting down their micro lab and I can't find any other lab in Western MA that is doing it. I took a look at the federal regulations and it appears that the Coli-ert 9223B method is acceptable. The units for this are reported as MPN – most probable number whereas 1603 was reported as CFU – colony forming units. They are considered equivalent. Can you check with your permit authority to see if this method would be acceptable? I still have to find another sub lab and make sure they can support your DMR study.

Here are the 40CFR Part 136 methods for E.coli <https://www.ecfr.gov/cgi-bin/text-idx?SID=641597700d90999f2960999c1049bb90&mc=true&node=pt40.25.136&rgn=div5> . We would utilize Phoenix Labs in Manchester. They do method SM9223B

| | | | | | |
|--|---|--------------------|--|----------------------|--|
| <i>E. coli</i> , number per 100 mL ²¹ | MPN ^{6 8 16} multiple tube, or | | 9221B.1-2006/9221F-2006 ^{12 14} | | |
| | multiple tube/multiple well, or | | 9223 B-200 4 ¹³ | 991.15 ¹⁰ | Colilert ^{®13 18} Colilert-18 ^{®13 17 18} |
| | MF ^{2 6 7 8} single step | 1603 ²² | | | mColiBlue-24 ^{®19} |

STEVEN HARTMANN
Service Center Manager

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